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## Before The FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC., COX COMMUNICATIONS GULF COAST, L.L.C., et. al.

Complainants,

GULF POWER COMPANY,

Respondent,

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P.A. No. 00-004

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TO: Enforcement Bureau

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## **CONSENT MOTION FOR EXTENSION OF TIME**

The Florida Cable Telecommunications Association, Inc. and Cox Communications Gulf Coast, L.L.C. (hereinafter "Complainants"), by their attorneys and pursuant to 47 C.F.R. § 1.46, hereby submit this Consent Motion seeking a brief extension of time to July 25, 2003 to file their Opposition to the Petition for Reconsideration filed by Gulf Power Company ("Gulf Power"), in the above-captioned proceeding. The Opposition would otherwise be due on July 9, 2003.

Good cause exists for granting this request, as it will enable Complainants to provide a full and accurate filing, so that the Commission can proceed with an appropriate record before it.

While the Commission does not routinely grant extensions of time, Complainants respectfully submit that the circumstances here warrant a grant of the instant Motion. Absent an extension of time, counsel for Complainants will experience scheduling conflicts involving numerous other pleadings with due dates on or around July 9, 2003, as well as scheduling conflicts with

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individual Complainants essential to the preparation of the Opposition. A grant of Complainants' Motion also will afford sufficient time to address the complex procedural and substantive issues, as well as new evidence presented in Gulf's Petition. In addition, counsel must coordinate and seek approval of its responsive submission among several different cable operator Complainants (and their industry association), which process will be greatly complicated with the anticipated schedules of clients' representatives during the intervening July 4<sup>th</sup> holiday weekend. Even without the scheduling and holiday issues, the complexity of the new procedural and substantive issues contained in Respondent's Petition warrants the requested extension. These issues, combined with counsel's and clients' schedules further bolster the need for such extension. Moreover, neither the public nor any other party will be prejudiced by this very brief delay, and counsel for Gulf Power has consented to the requested extension.

Accordingly, Complainants respectfully request that the Commission grant this Consent Motion for Extension of Time and allow Complainants until July 25, 2003 to file their Opposition to the Petition for Reconsideration.

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Respectfully submitted,

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COX COMMUNICATIONS GULF COAST, L.L.C.

June 26, 2003

## **CERTIFICATE OF SERVICE**

I, Linda M. Blair, a secretary with the law firm of Cole, Raywid & Braverman, LLP, do hereby certify that on this 26<sup>th</sup> day of June, 2003, have caused a copy of the foregoing "Consent Motion for Extension of Time" to be sent via first class mail or hand delivery\* to the following:

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